

## Attachment 1

In light of the investigations currently underway in Minnesota, Arizona, Oregon, New Mexico, Iowa and Utah into Qwest's disclosure of agreements signed with Eschelon Telecom Inc., Covad Communications Inc., and McLeod USA (the three CLECs), KPMG Consulting conducted a review of the Draft Final Report in order to identify specific test sections that contain conclusions that are based, in whole or in part, on representations, information, or data obtained from, or provided by the three CLECs. The following document describes the results of that review.

First, KPMG Consulting makes no assertion as to the accuracy or completeness of the information provided by the three CLECs. Second, KPMG Consulting makes no assertion as to whether or not the information received from the three CLECs is representative of the "typical" CLEC experience, given the preferential treatment the three CLECs may have received from Qwest.

Upon review, the evaluation criteria presented in the Draft Final Report fall into three categories with regard to reliance on information obtained from the three CLECs:

- "No Reliance." -- no CLEC participation was required, or utilized, as a data point for drawing conclusions in the Draft Final Report. This category represents the vast majority of the evaluation criteria contained in the Draft Final Report.
- "Partial Reliance." -- CLEC representations, information or data was used as one data point among many. For example, in evaluating the ISC help desk, KPMG Consulting interviewed several CLECs, monitored HPC's observations and exceptions, interviewed the P-CLEC, conducted on-site inspections of the ISC and reviewed relevant documentation. In these cases, the representations made by any individual CLEC were simply one of several inputs used by KPMG Consulting to draw its conclusions. Attached is a list of evaluation criteria, by number, that qualify for this category.
- "Substantial Reliance." -- CLEC representations, information or data was used as the primary data point used by KPMG Consulting in drawing its conclusions. Attached is a list of evaluation criteria, by number, that fall into this category.

In addition, in the attached we describe four other uses of CLEC information during the tests. KPMG Consulting would be happy to discuss this situation, and to provide further information about the potential impact of this disclosure on the test as required.

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Partial Reliance, Page 1

Test Number	Criterion	Evaluation Criteria	Comments
12	12-11-2	Product and feature offerings are comparable for both retail and wholesale services.	KPMG Consulting considered CLEC input in the evaluation of this criterion. However, CLEC comments were not the only source for data. Documentation reviews, Qwest interviews, Qwest observations and CLEC observations were also considered in the evaluation.
12	12-11-3	Pre-Order and Order capabilities are functionally equivalent for both retail and wholesale services.	same as 12-11-2
12.7	12.7-1-1	The end-user information that is required prior to the submission of a loop qualification is the same for wholesale and retail orders.	KPMG Consulting considered CLEC input in the evaluation of this criterion. However CLEC comments were not the only source for data. Documentation reviews, Qwest interviews, Qwest observations and CLEC observations were also considered in the evaluation.
12.7	12.7-1-2	The loop qualification query process is consistent for retail and wholesale customers.	same as 12.7-1-1
12.7	12.7-1-3	Processes and procedures are defined for addressing errors regarding loop qualifications in the retail and wholesale environments.	same as 12.7-1-1
12.7	12.7-1-4	The internal process flow used for loop qualification is consistent for retail and wholesale customers.	same as 12.7-1-1
12.7	12.7-1-5	Qwest contact information is readily available for retail and wholesale customers.	same as 12.7-1-1
12.7	12.7-1-6	The customer receives confirmation of the completion of a loop qualification, or can access the status of loop qualifications.	same as 12.7-1-1
12.7	12.7-1-7	Systems and processes are in place to allow wholesale and retail loop qualification queries to be performed using the customer address.	same as 12.7-1-1
12.7	12.7-1-8	Loop qualification response types that are provided are consistent between retail and wholesale customers.	same as 12.7-1-1
12.7	12.7-1-9	The escalation process for loop qualifications is consistent for retail and wholesale customers.	same as 12.7-1-1
12.7	12.7-1-11	Loop qualification performance measurement processes are consistent for retail and wholesale operations.	same as 12.7-1-1

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14	14-1-6	Qwest provisions High Capacity circuits by adhering to documented method and procedure tasks.	KPMG testers independently verified that Qwest technicians adhered to the documented methods and procedures and that the loop characteristics met the technical specifications for the intended service. One of the three CLEC participated in this test.
14	14-1-7	Qwest provisions Loop Migrations (Hot Cuts) by adhering to documented method and procedure tasks.	KPMG testers independently verified that the Qwest technicians adhered to the documented methods and procedures and the loop characteristics met the technical specifications for the intended service. One of the three CLEC participated in this test.
14	14-1-15	Qwest provisions Analog Loops by adhering to documented method and procedure tasks.	KPMG testers independently verified that Qwest technicians adhered to the documented methods and procedures and the loop characteristics met the technical specifications for the intended service. Two of the three CLEC participated in this test.
14	14-1-18	Qwest meets the performance benchmark for PID OP-3A, B, D, & E – Installation Commitments Met for All Products.	Resale and UNE-P data used in this PID calculation was primarily gathered from one of the three CLECs. Data for other products was gathered from two of the three CLECs.
14	14-1-22	Qwest meets the performance benchmark for PID OP- 8B – Number Portability Timeliness for LNP Loops with Coordination.	KPMG testers independently verified that LNP Loops with Coordination were installed on committed due date/time. One of the three CLECs provided facilities. Orders were issued by the P-CLEC on behalf of the participating CLEC.
14	14-1-23	Qwest meets the performance benchmark for PID OP- 8C – Number Portability Timeliness for LNP Loops without Coordination.	KPMG testers independently verified that LNP Loops without Coordination were installed on committed due date/time. Eschelon was one of several CLECs that provided facilities. Orders were issued by the P-CLEC on behalf of the participating CLEC.
14	14-1-24	Qwest meets the performance benchmark for PID OP-13A – Coordinated Cuts on Time – Unbundled Loop.	KPMG testers independently verified that Coordinated Cuts of Unbundled Loops were installed on the committed due date/time. One of the three CLECs provided facilities. Orders were issued by the P-CLEC on behalf of the participating CLEC.

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14	14-1-26	Qwest meets the parity performance requirements for PID OP-3A, B, D, & E – Installation Commitments Met for DS1 Loops.	KPMG testers independently verified that DS1 Loops were installed on the committed due date/time. One of the three CLECs participated in this evaluation. The PID calculation included commercial observations and test bed accounts.
14	14-1-28	Qwest meets the parity performance requirements for PID OP-4 A, B, D, & E – Installation Interval for DS1 Loops	KPMG testers independently verified that DS1 Loops were installed on the committed due date/time. One of the three CLECs participated in this evaluation. The PID calculation included commercial observations and test bed accounts.
14	14-1-29	Qwest meets the parity performance requirements for PID OP-5 – New Service Installation Quality All Products.	KPMG Consulting used data from Qwest on trouble history logs for all three of the CLECs along with several other participating CLECs.
18	18-1-1	Out-of-service trouble reports on wholesale services specified in PID MR-3 that require the dispatch of a technician are cleared within 24 hours.	KPMG observed employees from one CLEC initiate trouble reports and examined the corresponding Qwest trouble ticket. Results were incorporated into the calculation of this PID.
18	18-1-2	Out-of-Service trouble reports on wholesale services specified in PID MR-3 that do not require the dispatch of a technician are cleared within the defined interval.	same as 18-1-2
18	18-2-1	Out-of-Service and service-affecting trouble reports on wholesale services specified in PID MR-4 that require the dispatch of a technician are cleared within 48 hours.	same as 18-1-2
18	18-2-2	Out-of-Service and service-affecting trouble reports on wholesale services specified in PID MR-4 that do not require the dispatch of a technician are cleared within 48 hours.	same as 18-1-2
18	18-4-1	The mean time to restore wholesale services specified in PID MR-6 that require the dispatch of a technician is equal to or less than retail services.	same as 18-1-2
18	18-4-2	The mean time to restore wholesale services specified in PID MR-6 that do not require the dispatch of a technician is equal to or less than retail services.	same as 18-1-2
18	18-5-1	Repair of wholesale services specified in PID MR-9 that require the dispatch of a technician are made by the appointment date and time.	same as 18-1-2

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18	18-5-2	Repair of wholesale services specified in PID MR-9 that do not require the dispatch of a technician are made by the appointment date and time.	same as 18-1-2
24.6	24.6-2-4	Interface specifications that define applicable business rules, data formats/definitions and transmission protocols are made available to customers.	KPMG Consulting conducted interviews with one CLEC to understand any issues and concerns with Qwest's MEDIACC EB-TA interface development processes. Information obtained during interviews was just one of several data points used in the analysis and determination of results.
24.6	24.6-2-5	On-call customer support for interface specifications is provided.	same as 24.6-2-4
24.6	24.6-2-7	Qwest has a documented methodology for conducting carrier-to-carrier testing with customers seeking to interconnect.	same as 24.6-2-4
24.6	24.6-2-8	A functional test environment is made available to customers for all supported interfaces.	same as 24.6-2-4
24.6	24.6-2-9	Carrier-to-carrier test environments are available and segregated from Qwest production and development environments.	same as 24.6-2-4
24.6	24.6-2-10	On-call customer support for interface testing is provided.	same as 24.6-2-4
24.6	24.6-2-11	Carriers are provided with documented specifications for active test environments.	same as 24.6-2-4
24.6	24.6-2-12	Active test environments are managed to version control. Carriers are notified before changes are made to active test environments.	same as 24.6-2-4
24.6	24.6-2-13	Procedures are defined to log software "bugs," errors, and omissions in specifications and other issues discovered during carrier-to-carrier testing.	same as 24.6-2-4
24.6	24.6-2-16	Business rules and software change tracking tools exist, are updated, and are shared with customers.	same as 24.6-2-4
24.6	24.6-2-20	Defects and required changes are identified and tracked during pre-production testing.	same as 24.6-2-4

## Substantial Reliance

Test Number	Criterion	Evaluation Criteria	Comments
14	14-1-9	Qwest provisions ADSL Line Sharing circuits by adhering to documented method and procedure tasks.	KPMG testers independently verified that Qwest technicians adhered to the documented methods and procedures and the loop characteristics met the technical specifications for the intended service. KPMG testers primarily observed circuits from one of the three CLECs.
14	14-1-21	Qwest meets the performance benchmark for PID OP-4A, B, D, & E – Installation Interval for All Products.	Resale and UNE-P data used in this PID calculation was primarily gathered from one of the three CLECs. Data for other products was gathered from two of the three as well as other participating CLECs.
14	14-1-25	Qwest meets the parity performance requirements for PID OP-3A, B, D, & E – Installation Commitments Met for All Products.	Resale and UNE-P data used in this PID calculation was primarily gathered from one of the three CLECs. Data for other products was gathered from two of the three as well as other participating CLECs.
14	14-1-27	Qwest meets the parity performance requirements for PID OP-4 A, B, D, & E – Installation Interval for All Products.	Resale and UNE-P data used in this PID calculation was primarily gathered from one of the three CLECs. Data for other products was gathered from all three CLECs as well as other participating CLECs.

**Other Reliance**

<b>Test Number</b>	<b>Criterion</b>	<b>Evaluation Criteria</b>	<b>Comments</b>
18.7	N/A	None	KPMG Consulting conducted interviews with one of the three CLECs as well as two others to gather feedback pertaining to Qwest M&R work center interactions and experiences. KPMG Consulting used the information learned to place appropriate focus on those M&R work center process areas for which CLECs reported negative experiences
18.8	N/A	None	same as 18.7
23	N/A	None	KPMG Consulting conducted interviews with one of the three CLECs to understand Change Management processes and potential issues. None of the information obtained during the interviews was used to support conclusions reflected in the final report.
24.5	N/A	None	KPMG Consulting conducted interviews with one of the three CLECs to understand CLEC training issues and concerns. None of the information obtained during the interviews was used to support conclusions reflected in the final report.



## Attachment 2

In light of the investigations underway in several states into Qwest's disclosure of agreements signed with Eschelon Telecom Inc., Covad Communications Inc., and McLeod USA (the CLECs), KPMG Consulting conducted a review of the Draft Final Report in order to identify specific test sections that contain conclusions that were based, in whole or in part, on representations, information, or data obtained from, or provided by the CLECs.

The results of that analysis were discussed with the ROC Steering Committee on Monday May 6, 2002, and with the ROC TAG on Thursday May 9, 2002. On the TAG call AT&T requested that KPMG Consulting revise its documents to reflect the participation of an expanded list of CLECs. KPMG Consulting agreed to do so.

Ms. Mary Tribby of AT&T provided KPMG Consulting with that expanded list via email on Friday, May 10, 2002. The additional CLECs include: Arch Communications Group; e.spire; GST Telecom; Nextel; US Link/Info Tel; VoiceStream; Western Wireless; and, WorldCom.

WorldCom requested that KPMG Consulting answer certain written questions about our CLEC Participation review. KPMG Consulting submitted its written answers to WorldCom's questions on May 22, 2002. During the hearings held in Washington during the week of June 3, 2002, WorldCom further requested that KPMG Consulting revise its written answers to the WorldCom's questions to reflect the participation of the additional CLECs. KPMG Consulting agreed to do so.

KPMG Consulting has revised its original Word document to reflect the history of this issue, and has also revised the companion Excel Workbook to reflect the additional information required to describe the participation of the additional CLECs.

In our original Word document, KPMG Consulting made no assertion as to the accuracy or completeness of the information provided to us by the participating CLECs. We affirm that statement. KPMG Consulting did not audit information provided to us by the participating CLECs, except to compare the information provided with corresponding information available from Qwest, when appropriate.

In addition, in our original Word document KPMG Consulting made no assertion as to whether or not the information received from the CLECs is representative of the "typical" CLEC experience. We also affirm that statement. KPMG Consulting made no attempt to investigate whether or not the information provided by one of the participating CLECs was consistent with information held by other CLECs.

KPMG Consulting is not aware of any evidence that suggests that Qwest has given preferential treatment to any of the participating CLECs in a manner that would undermine the credibility of the information relied upon by KPMG Consulting.

Upon review, the evaluation criteria presented in the Final Report fall into three categories with regard to reliance on information obtained from the CLECs:

- "No Reliance." -- no CLEC participation was required, or utilized, as a data point for drawing conclusions in the Final Report. This category represents the vast majority of the evaluation criteria contained in the Final Report.
- "Partial Reliance." -- CLEC representations, information or data was used as one data point among many. For example, in evaluating the ISC help desk, KPMG Consulting interviewed several CLECs, monitored HPC's observations and exceptions, interviewed the P-CLEC, conducted on-site inspections of the ISC and reviewed relevant documentation. In these cases, the representations made by any individual CLEC were simply one of several inputs used by KPMG Consulting to draw its conclusions. Attached is a list of evaluation criteria, by number, that qualify for this category.
- "Substantial Reliance." -- CLEC representations, information or data was used as the primary source used by KPMG Consulting in drawing its conclusions. Attached is a list of evaluation criteria, by number, that fall into this category.

In addition, in the attached we describe seven other uses of CLEC information during the tests.

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Test Number	Criterion	Evaluation Criteria	Comments
12	12-5-1	Qwest systems or representatives provide required order transaction functionality.	Information on functionality of submission of UDIT orders were one of many inputs considered in KPMG Consulting's analysis
12	12-11-2	Product and feature offerings are comparable for both retail and wholesale services.	KPMG Consulting considered CLEC input in the evaluation of this criterion. However, CLEC comments were not the only source for data. Documentation reviews, Qwest interviews, Qwest observations and CLEC observations were also considered in the evaluation.
12	12-11-3	Pre-Order and Order capabilities are functionally equivalent for both retail and wholesale services.	same as 12-11-2
12.7	12.7-1-1	The end-user information that is required prior to the submission of a loop qualification is the same for wholesale and retail orders.	KPMG Consulting considered CLEC input in the evaluation of this criterion. However, CLEC comments were not the only source for data. Documentation reviews, Qwest interviews, Qwest observations and CLEC observations were also considered in the evaluation.
12.7	12.7-1-2	The loop qualification query process is consistent for retail and wholesale customers.	same as 12.7-1-1
12.7	12.7-1-3	Processes and procedures are defined for addressing errors regarding loop qualifications in the retail and wholesale environments.	same as 12.7-1-1
12.7	12.7-1-4	The internal process flow used for loop qualification is consistent for retail and wholesale customers.	same as 12.7-1-1
12.7	12.7-1-5	Qwest contact information is readily available for retail and wholesale customers.	same as 12.7-1-1
12.7	12.7-1-6	The customer receives confirmation of the completion of a loop qualification, or can access the status of loop qualifications.	same as 12.7-1-1
12.7	12.7-1-7	Systems and processes are in place to allow wholesale and retail loop qualification queries to be performed using the customer address.	same as 12.7-1-1
12.7	12.7-1-8	Loop qualification response types that are provided are consistent between retail and wholesale customers.	same as 12.7-1-1
12.7	12.7-1-9	The escalation process for loop qualifications is consistent for retail and wholesale customers.	same as 12.7-1-1

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12.7	12.7-1-11	Loop qualification performance measurement processes are consistent for retail and wholesale operations.	same as 12.7-1-1
14	14-1-6	Qwest provisions High Capacity circuits by adhering to documented method and procedure tasks.	KPMG testers independently verified that Qwest technicians adhered to the documented methods and procedures and that the loop characteristics met the technical specifications for the intended service. One CLEC participated in this test.
14	14-1-7	Qwest provisions Loop Migrations (Hot Cuts) by adhering to documented method and procedure tasks.	KPMG testers independently verified that the Qwest technicians adhered to the documented methods and procedures and the loop characteristics met the technical specifications for the intended service. One CLEC participated in this test.
14	14-1-15	Qwest provisions Analog Loops by adhering to documented method and procedure tasks.	KPMG testers independently verified that Qwest technicians adhered to the documented methods and procedures and the loop characteristics met the technical specifications for the intended service. Two CLECs participated in this test.
14	14-1-18	Qwest meets the performance benchmark for PID OP-3A, B, D, & E – Installation Commitments Met for All Products.	Resale and UNE-P data used in this PID calculation was primarily gathered from one of the three CLECs. Data for other products was gathered from two CLECs.
14	14-1-22	Qwest meets the performance benchmark for PID OP- 8B – Number Portability Timeliness for LNP Loops with Coordination.	KPMG testers independently verified that LNP Loops with Coordination were installed on committed due date/time. One CLEC provided facilities. Orders were issued by the P-CLEC on behalf of the participating CLEC.
14	14-1-23	Qwest meets the performance benchmark for PID OP- 8C – Number Portability Timeliness for LNP Loops without Coordination.	KPMG testers independently verified that LNP Loops without Coordination were installed on committed due date/time; several CLECs provided facilities. Orders were issued by the P-CLEC on behalf of the participating CLEC.
14	14-1-24	Qwest meets the performance benchmark for PID OP-13A – Coordinated Cuts on Time – Unbundled Loop.	KPMG testers independently verified that Coordinated Cuts of Unbundled Loops were installed on the committed due date/time. One CLEC provided facilities. Orders were issued by the P-CLEC on behalf of the participating CLEC.

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14	14-1-26	Qwest meets the parity performance requirements for PID OP-3A, B, D, & E – Installation Commitments Met for DS1 Loops.	KPMG testers independently verified that DS1 Loops were installed on the committed due date/time. One CLEC participated in this evaluation. The PID calculation included commercial observations and test bed accounts.
14	14-1-28	Qwest meets the parity performance requirements for PID OP-4 A, B, D, & E – Installation Interval for DS1 Loops	KPMG testers independently verified that DS1 Loops were installed on the committed due date/time. One CLEC participated in this evaluation. The PID calculation included commercial observations and test bed accounts.
14	14-1-29	Qwest meets the parity performance requirements for PID OP-5 – New Service Installation Quality All Products.	KPMG Consulting used data from Qwest on trouble history logs for several participating CLECs.
17	17-1-1	The user is able to enter a trouble report into EB-TA and receive a satisfactory response for at least 95% of transactions.	KPMG Consulting examined a participating CLEC's JIA and EBTA interface to evaluate the system's functionality and performance. KPMG Consulting designed the test cases, directed the CLEC as the test instances were entered, and based its evaluation on direct observation of the performance of the EBTA interface.
17	17-1-2	The user is able to request trouble report status from EB-TA and receive a satisfactory response for at least 95% of transactions.	same as 17-1-1
17	17-1-3	The user is able to add trouble information to an EB-TA trouble report and receive a satisfactory response for at least 95% of transactions.	same as 17-1-1
17	17-1-4	The user is able to modify trouble administration information on an EB-TA trouble report and receive a satisfactory response for at least 95% of transactions.	same as 17-1-1
17	17-1-5	The user is able to cancel a trouble report in EB-TA and receive a satisfactory response for at least 95% of transactions.	same as 17-1-1
17	17-1-6	The user is able to respond to trouble repair completion notifications and receive a satisfactory response for at least 95% of transactions.	same as 17-1-1
17	17-1-7	The user is able to conduct a Mechanized Loop Test (MLT) and receive a satisfactory response for at least 95% of transactions.	same as 17-1-1

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17	17-1-8	The functionality of the wholesale trouble reporting system is comparable to the functionality of the retail trouble reporting system.	same as 17-1-1
18	18-1-1	Out-of-service trouble reports on wholesale services specified in PID MR-3 that require the dispatch of a technician are cleared within 24 hours.	KPMG observed employees from one CLEC initiate trouble reports and examined the corresponding Qwest trouble ticket. Results were incorporated into the calculation of this PID.
18	18-1-2	Out-of-Service trouble reports on wholesale services specified in PID MR-3 that do not require the dispatch of a technician are cleared within the defined interval.	same as 18-1-2
18	18-2-1	Out-of-Service and service-affecting trouble reports on wholesale services specified in PID MR-4 that require the dispatch of a technician are cleared within 48 hours.	same as 18-1-2
18	18-2-2	Out-of-Service and service-affecting trouble reports on wholesale services specified in PID MR-4 that do not require the dispatch of a technician are cleared within 48 hours.	same as 18-1-2
18	18-4-1	The mean time to restore wholesale services specified in PID MR-6 that require the dispatch of a technician is equal to or less than retail services.	same as 18-1-2
18	18-4-2	The mean time to restore wholesale services specified in PID MR-6 that do not require the dispatch of a technician is equal to or less than retail services.	same as 18-1-2
18	18-5-1	Repair of wholesale services specified in PID MR-9 that require the dispatch of a technician are made by the appointment date and time.	same as 18-1-2
18	18-5-2	Repair of wholesale services specified in PID MR-9 that do not require the dispatch of a technician are made by the appointment date and time.	same as 18-1-2
19.6	19.6-1-13	Procedures for CLEC retransmission requests are documented.	CLEC input was used to corroborate KPMG Consulting's findings.
19.6	19.6-1-14	CLECs can readily check the status of retransmission requests.	same as 19.6-1-13
20	20-2-2	Recurring rates on UNE bills are consistent with applicable tariffs and/or contract rates.	Data from UDIT orders billed to participating CLEC represented a very small subset of charges that were validated.
20	20-2-5	Non-recurring rates on UNE bills are consistent with applicable tariffs and/or contract rates.	same as 20-2-2

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20	20-2-14	Calculations on UNE bills correspond with tariff and/or published definitions.	same as 20-2-2
20	20-3-1	Wholesale bill completeness as defined by PID BI-4A, is in parity with retail bill completeness.	same as 20-2-2
20	20-3-3	Wholesale bill accuracy as defined by PID BI-3A, is in parity with retail bill accuracy.	same as 20-2-2
24.6	24.6-2-4	Interface specifications that define applicable business rules, data formats/definitions and transmission protocols are made available to customers.	KPMG Consulting conducted interviews with one CLEC to understand any issues and concerns with Qwest's MEDIACC EB-TA interface development processes. Information obtained during interviews was just one of several data points used in the analysis and determination of results.
24.6	24.6-2-5	On-call customer support for interface specifications is provided.	same as 24.6-2-4
24.6	24.6-2-7	Qwest has a documented methodology for conducting carrier-to-carrier testing with customers seeking to interconnect.	same as 24.6-2-4
24.6	24.6-2-8	A functional test environment is made available to customers for all supported interfaces.	same as 24.6-2-4
24.6	24.6-2-9	Carrier-to-carrier test environments are available and segregated from Qwest production and development environments.	same as 24.6-2-4
24.6	24.6-2-10	On-call customer support for interface testing is provided.	same as 24.6-2-4
24.6	24.6-2-11	Carriers are provided with documented specifications for active test environments.	same as 24.6-2-4
24.6	24.6-2-12	Active test environments are managed to version control. Carriers are notified before changes are made to active test environments.	same as 24.6-2-4
24.6	24.6-2-13	Procedures are defined to log software "bugs," errors, and omissions in specifications and other issues discovered during carrier-to-carrier testing.	same as 24.6-2-4
24.6	24.6-2-16	Business rules and software change tracking tools exist, are updated, and are shared with customers.	same as 24.6-2-4
24.6	24.6-2-20	Defects and required changes are identified and tracked during pre-production testing.	same as 24.6-2-4



### Substantial Reliance

Test Number	Criterion	Evaluation Criteria
14	14-1-9	Qwest provisions ADSL Line Sharing circuits by adhering to documented method and procedure tasks.
14	14-1-21	Qwest meets the performance benchmark for PID OP-4A, B, D, & E – Installation Interval for All Products.
14	14-1-25	Qwest meets the parity performance requirements for PID OP-3A, B, D, & E – Installation Commitments Met for All Products.
14	14-1-27	Qwest meets the parity performance requirements for PID OP-4 A, B, D, & E – Installation Interval for All Products.

# Other Reliance

Test Number	Criterion	Evaluation Criteria	Comments
18.7	N/A	None	KPMG Consulting conducted interviews with one CLEC to understand Change Management processes and potential issues. None of the information obtained during the interviews was used to support conclusions reflected in the final report.
18.8	N/A	None	same as 18.7
23	N/A	None	KPMG Consulting conducted interviews with CLECs to understand Change Management processes and potential issues. None of the information obtained during the interviews was used to support conclusions reflected in the final report.
24.3	N/A	None	same as 23
24.4	N/A	None	same as 23
24.5	N/A	None	KPMG Consulting conducted interviews with one CLEC to understand Change Management processes and potential issues. None of the information obtained during the interviews was used to support conclusions reflected in the final report.
24.7	N/A	None	same as 23